

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Cause No. 18 CR 2945 WJ
	)	
SIRAJ IBN WAHHAJ,	)	
	)	
Defendant.	)	

**SUPPLEMENT TO REPLY TO GOVERNMENT’S RESPONSE TO MOTION TO  
DISMISS FOR OUTRAGEOUS GOVERNMENT CONDUCT**

SIRAJ IBN WAHHAJ, Defendant, by and through his appointed counsel, Thomas Clark and Marc H. Robert, hereby submits the following supplement to his Reply [Doc. 525] to the Government’s Response [Doc. 502] to his Motion to Dismiss for Outrageous Government Conduct [Doc. 476], and in that connection would respectfully show the Court as follows:

1. Siraj Ibn Wahhaj, through appointed counsel, filed his motion to dismiss for outrageous government conduct on October 24, 2022 [Doc. 476]. Exhibits A through U were attached to the document. The government filed its response to the motion on November 7, 2022 [Doc. 502]. Mr. Wahhaj filed a Reply to the Response on November 18, 2022 [Doc. 525].
2. Mr. Wahhaj’s Reply referred to five additional Exhibits, V through Z, but those exhibits were inadvertently not attached to the Reply.
3. This Supplement corrects that omission by attaching those five exhibits, V, W, X, Y and Z.

4. The original motion was joined by all Defendants. This supplement is likewise submitted on behalf of all Defendants.

WHEREFORE, SIRAJ IBN WAHHAJ, Defendant, by and through his appointed counsel, respectfully requests that the Court accept this supplement and the attachments, grant the underlying motion and provide such other and further relief to which the Court may find Mr. Wahhaj to be justly entitled.

Respectfully Submitted,

Electronically Signed: \_\_\_\_\_

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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to opposing counsel of record.

Electronically Signed: \_\_\_\_\_

MARC H. ROBERT

Counsel for Siraj Ibn Wahhaj